

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

RS FIT NW LLC,<sup>1</sup>

Debtors.

24 HOUR FITNESS WORLDWIDE, INC.,

Plaintiff,

v.

CONTINENTAL CASUALTY COMPANY;  
ENDURANCE AMERICAN SPECIALTY  
INSURANCE COMPANY; STARR SURPLUS  
LINES INSURANCE COMPANY; ALLIANZ  
GLOBAL RISKS US INSURANCE COMPANY;  
LIBERTY MUTUAL INSURANCE COMPANY;  
BEAZLEY-LLOYD'S SYNDICATES 2623/623;  
ALLIED WORLD NATIONAL ASSURANCE  
COMPANY; QBE SPECIALTY INSURANCE  
COMPANY; and GENERAL SECURITY  
INDEMNITY COMPANY OF ARIZONA,

Defendants.

Chapter 11

Case No.: 20-11568 (KBO)  
(Jointly Administered)

Adv. Proc. No. 20-51051 (TMH)

**MOTION AND ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 9010-1 and the attached certification, counsel moves the admission pro hac vice of Carolyn J. Fairless, Esq. to represent Allied World National Assurance Company in this action.

Dated: January 13, 2025

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

Michael Busenkell (DE 3933)  
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<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor's federal tax identification number, as applicable, is RS FIT NW LLC (9372). By Order dated March 16, 2021, the remaining reorganized debtor affiliates' (the "Reorganized Debtors") chapter 11 cases were closed. The Reorganized Debtors' corporate headquarters and service address is 24 Hour Fitness USA, Inc., 1265 Laurel Tree Lane, Carlsbad, CA 92011.

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the States of Colorado and Montana and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with Standing Order for District Court Fund revised 12/21/2023. I further certify that the fee of \$50.00 has been paid to the Clerk of Court for District Court.

Dated: January 13, 2025

WHEELER TRIGG O'DONNELL LLP

/s/ Carolyn J. Fairless

Carolyn J. Fairless

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**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is GRANTED.